

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS LETTER BRIEF  
RE OUTSTANDING DISCOVERY ITEMS**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal (“Waymo’s Administrative Motion”) confidential information in its Letter Brief Regarding Outstanding Discovery Items (“Waymo’s Letter Brief”). Waymo’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Letter Brief	Highlighted in blue	Defendants
Exhibit 1 to Waymo’s Reply	Entire document	Defendants
Exhibit 3 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 4 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 5 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 6 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 7 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 8 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 11 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 12 to Waymo’s Letter Brief	Entire document	Defendants
Exhibit 13 to Waymo’s Letter Brief	Entire document	Defendants

3. Waymo’s Letter Brief and exhibits contain information that Defendants have designated as confidential and/or highly confidential.

4. Waymo takes no position on the merits of sealing the designated material, and expects Defendants to file one or more declarations in accordance with the Local Rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on December 20, 2017.

By /s/ Lindsay Cooper  
 Lindsay Cooper  
 Attorneys for WAYMO LLC

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven